

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

ROSY GIRON DE REYES, *et al.*,

*Plaintiffs,*

vs.

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP, *et al.*,

*Defendants.*

Civ. No. 1:16-cv-00563 (TSE/TCB)

**CONSENT MOTION FOR EXTENSION OF TIME**

Pursuant to Fed. R. Civ. P. 6(b), and with the consent of Defendants, Plaintiffs respectfully request an extension of the briefing deadline for their forthcoming memorandum in opposition to Defendants' Motion to Strike the Opinions and Testimony of Prof. William A.V. Clark [Dkt. #293] ("Motion to Strike"). In support of this motion, Plaintiffs respectfully represent as follows:

1. Defendants filed their Motion to Strike on September 22, 2020. Dkt. #293. Plaintiffs' memorandum in opposition thereto is currently due on October 6, 2020. L.R. 7(F)(1).
2. Subsequently, on September 25, this Court continued the pretrial filing deadlines in this case to December 4, 2020, at 5:00pm. Dkt. #297 at p.2.
3. Counsel for Plaintiffs is working diligently on preparing a response to the Motion to Strike, but also has several other pressing deadlines in other litigation matters. With the continuance of the pretrial filing deadlines, the time pressure to resolve the Motion to Strike is considerably eased.

4. For this reason, Plaintiffs request—and Defendants consent to—a six-day enlargement of Plaintiffs’ response deadline to the Motion to Strike, such that Plaintiffs’ memorandum in opposition be filed on October 12, 2020.

5. Plaintiffs have agreed to extend like courtesy to Defendants, such that Defendants’ Reply memorandum be filed on October 23, 2020. The parties have agreed to notice the Motion to Strike for a hearing on Friday, October 30, 2020—still over a month before the December 4 pretrial filing deadline in this case.

6. A proposed order is attached for the Court’s convenience. The parties waive hearing on this Motion for Extension of Time.

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
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October 1, 2020

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**Certificate of Service**

I hereby certify that on this 1st day of October, 2020, I caused the foregoing, along with all attachments thereto, to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing (NEF) to all counsel of record.

\_\_\_\_\_/s/\_\_\_\_\_  
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